

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA

-v-

10 Cr. 147 (S-4) (SLT)

MICHAEL PERSICO, et al.,

NOTICE OF MOTION

Defendants.

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PLEASE TAKE NOTICE THAT, upon the annexed affirmation of SARITA KEDIA, dated the 18th day of May, 2012, and the memorandum of law submitted herewith, the defendant Michael Persico will move this Court before the Honorable Sandra L. Townes, United States District Judge, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on a date fixed by this Court, for an Order

I. To suppress any and all fruits of the February 7, 1991, search of the business premises known as Romantique Limousines on the following grounds: (1) the probable cause affidavit knowingly and recklessly contained numerous falsehoods and material omissions; (2) the warrant was overbroad, calling for the seizure of items unrelated to the crime ostensibly committed; and (3) the search was unlawfully executed; and

II. Grant such other and further relief that this Court deems just and proper.

Dated: New York, New York
May 18, 2012

Respectfully submitted,
/s/
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TO: Honorable Sandra L. Townes
United States District Judge

Government Counsel